

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
JOANN INC., ¹)	Case No. 25-10068 (CTG)
)	
Post-Effective Date Debtor.)	
)	Re: Docket No. 1879

**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR'S
EIGHTEENTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN SUPERSEDED CLAIMS**

The undersigned counsel to the Plan Administrator in the above-captioned case hereby certifies as follows:

1. On December 12, 2025, the *Plan Administrator's Eighteenth (Non-Substantive) Omnibus Objection to Certain Superseded Claims* [Docket No. 1879] (the "Objection") was filed with the United States Bankruptcy Court for the District of Delaware (the "Court"). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the "Proposed Order").
2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was January 5, 2026 at 4:00 p.m. (prevailing Eastern Time) (the "Response Deadline").
3. Prior to the Response Deadline, the Plan Administrator received informal responses to the Objection and Proposed Order from the following claimants, or their counsel, including:
(i) Alto Conyers Plaza, LP ("Alto") (Claim Nos. 7610, 9346), (ii) GLP Flint LLC, Pollack Flint LLC, TJS Flint LLC (Claim No. 7908), and (iii) IN-Goshen Market, LLC (Claim No. 18911).

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is JOANN Inc. (5540). The Post-Effective Date Debtor's mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

4. No other claimant listed on the Objection has responded to the Plan Administrator's Objection.

5. The Plan Administrator and counsel to Alto have agreed to resolve Alto's informal response via a separate certification of counsel.

6. Additionally, the Plan Administrator's Objection with respect to the claims of GLP Flint LLC, Pollack Flint LLC, TJS Flint LLC (Claim No. 7908) and IN-Goshen Market, LLC (Claim No. 18911) has been adjourned to the omnibus hearing scheduled for January 28, 2026 at 10:00 a.m. (ET).

7. A revised Proposed Order removing the Claimants' claims is attached hereto as **Exhibit A** (the "Revised Proposed Order").

8. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

9. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

[Remainder of page Intentionally Left Blank]

Dated: January 9, 2026
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Jack M. Dougherty (No. 6784)
Michael E. Fitzpatrick (No. 6797)
500 Delaware Avenue, Suite 600
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
jdougherty@coleschotz.com
mfitzpatrick@coleschotz.com

- and -

HAHN LOESER & PARKS LLP

Christopher B. Wick (admitted *pro hac vice*)
Philip K. Stovall (admitted *pro hac vice*)
200 Public Square, Suite 2800
Cleveland, Ohio 44114
Telephone: (216) 274-2489
Facsimile: (216) 241-2824
Email: cwick@hahnlaw.com
pstovall@hahnlaw.com

Co-Counsel to the Plan Administrator